

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
JOSEPH DONALD GRIM	:	
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
Vs	:	
	:	
JOSEPH DONALD GRIM	:	
Respondent	:	CASE NO. 1:24-bk-02468-HWV

**TRUSTEE’S MOTION TO DISMISS CASE**  
**FOR FAILURE OF DEBTOR TO PROVIDE THE CHAPTER 13 TRUSTEE**  
**WITH COPIES OF THEIR 2024 FEDERAL INCOME TAX RETURNS**

AND NOW, this 21<sup>st</sup> day of May 2025, Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania, by and through his attorney Douglas R. Roeder, Esquire, hereby moves this Honorable Court to dismiss the above-captioned Chapter 13 bankruptcy case in accordance with §§ 521 and 1307(c) for failure of Debtor to provide the Chapter 13 Trustee with copies of their 2024 federal income tax return, and in support thereof, states as follows:

1. On or about September 27, 2024, Debtor filed a Petition under Chapter 13 of the Bankruptcy Code. (ECF No. 1).
2. Debtor’s Chapter 13 Plan was confirmed by Order dated December 17, 2024. (ECF No. 19).

3. Pursuant to § 521(f), Trustee is allowed to request “a copy of each Federal income tax return required under applicable law (or at the election of the debtor, a transcript of such tax return) with respect to each tax year of the debtor ending while the case is pending under such chapter.”

4. By letter dated April 21, 2025, Trustee provided Debtor ten (10) days to submit a copy of their 2024 federal income tax return.

5. By letter dated May 5, 2025, Trustee sent a second notice providing Debtor ten (10) days to submit a copy of their 2024 federal income tax return.

6. To date, Debtor has not complied with Trustee’s request for their 2024 federal income tax returns.

7. Accordingly, Trustee hereby moves to dismiss the case.

WHEREFORE, your Trustee respectfully requests your Honorable Court dismiss the case in accordance with §§ 521 and 1307(c) and grant any further relief that is equitable and just.

Date: May 21, 2025

Respectfully submitted,  
/s/ Douglas R. Roeder, Esquire  
Attorney ID: 80016  
Attorney for Trustee  
Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
Email: droeder@pamd13trustee.com

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**NOTICE**

NOTICE IS HEREBY GIVEN that Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania filed a Motion to Dismiss on May 7, 2025.

If you object to the relief requested, you must file your objection/response on or before June 3, 2025, with the Clerk of Bankruptcy Court, Sylvia H. Rambo U.S. Courthouse No.4B, 1501 North 6<sup>th</sup> Street, Harrisburg, PA 17102, and serve a copy on the Trustee and/or the United States Trustee.

A hearing has been scheduled for June 11, 2025, at 9:35 a.m., at U.S. Bankruptcy Court, Sylvia H. Rambo U.S. Courthouse No.4B, 1501 North 6<sup>th</sup> Street, Harrisburg, PA 17102, and will be held regardless of any objections or responses having been filed.

Date: May 21, 2025

Respectfully submitted,  
/s/ Douglas R. Roeder, Esquire  
Attorney ID: 80016  
Attorney for Trustee  
Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
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**ORDER DISMISSING CASE**

Upon consideration of the Trustee's Motion to Dismiss, it is hereby Ordered that the above-captioned bankruptcy be and hereby is DISMISSED. The Court retains jurisdiction to rule on any timely filed fee applications.

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**CERTIFICATE OF SERVICE**

I certify that I am more than 18 years of age and that on May 21, 2025, I served a copy of this Motion to Dismiss, Notice, and Proposed Order on the following parties from Hummelstown, PA, unless served electronically:

**SERVED ELECTRONICALLY**

United State Trustee  
1501 North 6<sup>th</sup> Street  
P.O. Box 302  
Harrisburg, PA 17102

Dawn Marie Cutaia, Esquire  
Fresh Start Law PLLC  
1701 West Market Street  
York PA 17404

**SERVED BY FIRST CLASS MAIL**

Joseph Donald Grim  
2037 W Philadelphia Street  
York Pa 17407-5109

I certify under penalty of perjury that the foregoing is true and correct.

Date: May 21, 2025

/s/ Ashley Schott  
Office of the Standing Chapter 13 Trustee  
Jack N. Zaharopoulos  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
Email: info@pamd13trustee.com

